

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA**

**U.S. SECURITIES AND EXCHANGE
COMMISSION,**

Plaintiff,

v.

**WYNN A.D. CHARLEBOIS and
WC PRIVATE LLC,**

Defendants.

**Civil Action No.
3:22-cv-00223-RJC-DCK**

DEFENDANTS' MOTION FOR TEMPORARY RELEASE OF PEARL JEWELRY

Defendants Wynn A.D. Charlebois and WC Private LLC move this Court for an order allowing the temporary release of 3 strands of Mikimoto pearls that are held in a lockbox that is frozen by order of this Court. In support of this motion, defendants show the Court:

1. Counsel for the SEC has been consulted and does not object to this motion.
2. By order of this Court [Doc. 8, 15] defendants' assets are frozen.
3. Defendant Wynn Charlebois' wife's mother has passed away and her funeral is tomorrow. The family desires for her grandchildren to wear pearls that are held in a lockbox located at the Bank of America branch located at 751 Providence Road, Charlotte, N.C. 28207. The pearls in question are heirlooms that have been possessed by the family for decades. The defendants agree to return the pearls after the funeral.

WHEREFORE, defendants move this Court for an order allowing defendants to retrieve the 3 strands of pearls today, July 20, 2022 and returning them no later than July 25, 2022.

A supporting order is attached.

Dated: June 18, 2022

Respectfully submitted,

/s/ Noell P. Tin

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*Counsel for defendants Wynn Charlebois and
WC Private LLC*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that he has served the foregoing DEFENDANTS' MOTION FOR TEMPORARY RELEASE OF PEARL JEWELRY with the Clerk of Court using the CM/ECF system, which will send notification of such filing to opposing counsel:

Robert F. Schroeder
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Regional Trial Counsel
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Dated: July 20, 2022

/s/ Noell P. Tin